

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---------------------------------|---|--------------------------|
| In re: |) | Chapter 11 |
| |) | |
| BHF CHICAGO HOUSING GROUP B LLC |) | Case No. 20-12453 |
| (ICARUS) |) | |
| |) | Hon. Jack B. Schmetterer |
| Debtor. |) | |
| |) | |

**AMENDED NOTICE OF MOTION FOR ENTRY OF (I) AN ORDER (A) APPROVING
BID PROCEDURES AND BID PROTECTIONS IN CONNECTION WITH THE SALE
OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS FREE AND CLEAR OF ALL
LIENS, CLAIMS, AND ENCUMBRANCES, (B) APPROVING THE FORM
AND MANNER OF NOTICE, (C) SCHEDULING A SALE HEARING AND, IF
NECESSARY, AN AUCTION, (E) APPROVING THE STALKING HORSE BID, AND (F)
GRANTING RELATED RELIEF; AND (II) AN ORDER (A) APPROVING THE
PURCHASE AND SALE AGREEMENT, (B) AUTHORIZING THE SALE OF THE
PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND
INTERESTS, AND (C) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on **July 7, 2020 at 10:30 a.m.** (prevailing Central Time) or as soon thereafter as counsel may be heard, we shall appear before the Honorable Jack B. Schmetterer in Courtroom 682 in the United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, or before any other judge who may be sitting in his place and stead, and present the *Debtors' Motion for Entry of (I) an Order (a) Approving Bid Procedures and Bid Protections in Connection with the Sale of Substantially All of the Debtor's Assets Free and Clear of All Liens, Claims, and Encumbrances (b) Approving the Form and Manner of Notice, (c) Scheduling a Sale Hearing and, If Necessary, an Auction, (d) Approving the Stalking Horse Bid, and (e) Granting Related Relief; and (II) an Order (a) Approving the Asset Purchase Agreement, (b) Authorizing the Sale of the Property Free and Clear of All Liens, Claims, Encumbrances, and Interests, and (c) Granting Related Relief* (the "Motion"), at which time and place you may appear if you so desire

THIS MOTION WILL BE PRESENTED AND HEARD TELEPHONICALLY. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.Court-Solutions.com or by calling Court Solutions at (917) 746-7476.

PLEASE TAKE FURTHER NOTICE that, pursuant to General Order No. 20-03, any party that objects to the relief sought in the Motion must file a Notice of Objection no later than two (2) business days before the date of presentment. Please be advised that if a Notice of

Objection is not timely filed, the Court may grant the Motion without a hearing before the date of presentment.

Dated: June 29, 2020

Respectfully submitted,

**BHF CHICAGO HOUSING GROUP B, LLC
(ICARUS)**

By: /s/ Kevin H. Morse

One of Its Proposed Attorneys

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CERTIFICATE OF SERVICE

I, Kevin H. Morse, an attorney, certify that I caused a copy of the AMENDED NOTICE OF MOTION FOR ENTRY OF(I) AN ORDER (A) APPROVING BID PROCEDURES AND BID PROTECTIONS IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES, (B) APPROVING THE FORM AND MANNER OF NOTICE, (C) SCHEDULING A SALE HEARING AND, IF NECESSARY, AN AUCTION, (E) APPROVING THE STALKING HORSE BID, AND (F) GRANTING RELATED RELIEF; AND (II) AN ORDER (A) APPROVING THE PURCHASE AND SALE AGREEMENT, (B) AUTHORIZING THE SALE OF THE PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS, AND (C) GRANTING RELATED RELIEF to be served on the parties listed on the attached service list via the Court's CM/ECF system, on June 29, 2020.

Dated: June 29, 2020

By: /s/ Kevin H. Morse

Via ECF:

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